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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

chikezie Ottah

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been assigned)

-against-

MTA

COMPLAINT

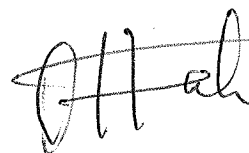
Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.



I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

35 USC 271 (A)

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

_____.

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

United States District Court,
Southern District of New York

Chikezie Ottah

V

CivilAction

MTA

INTRODUCTION

The MTA have been informed of this impending law suit many times and they refuse to address it, the last time MTA receive some information consigning this law suit was on 2021. The case as I have address it to MTA is an infringement of US Patent 7,152840. They have been mounting a book holder (a camera holder) in their buses, vehicles,, and others, I have sent a copy of picture(s) with the buses registration to they, which they did not denied, lately they even refused to give me the name of the contractor or the supplier, this is the reasons for the instant law suit to them and not their subsidiaries or contractors.

US Patent 7,152,840 is named Book Holder, it was issued in 2006, the book holder, have modifiable, adjustable stands to holder books and electronic in a structures or mobile vehicle, the electronic are computers, books, laptops, camera, cell phone and more, holding this books and electronic with their designed equipment. ADJUSTABLE RESILLIENT TOOL

MEMORANDE OF LAW

This law suit as mention early is an infringement, a civil law suit, 35 USC 271(A).

Using the inter-conjunctive words to sort the meaning and definition of the claim, the claimed words and words in specification indicate that on the reference, the use of conjunction word (Adjustable) before resilient clip, The applicant submits that the invention is not anticipate by the prior arts, further the use of adjustable , resilient clip arm on the clasp for clasping the book holder on a movable vehicle provide quick removal and attachment without tools, axial adjustment for adjusting the space between the clasp and the book support, rotational adjustment on the arm between the clasp and the book support, pivotal adjustments between the arm and the book support for is not obvious in the light of prior art.

Show there is other tools or methods included, on the same day July 25, I stated to the examiner that a claimed audio video and equipment has been add to the specification, see US Appl.10/366,779, page 12/13, column 33/34. It is undisputed facts no prior art mention a cable or audio video equipment anywhere, it is obvious in the light of the prior art, the limitation of electronic tooling.

I learned, and respectfully state that the district courts ruling in the case number 10 cv. 7296 from USDC, and Appeal case number 12-1405 USCA Fed. Circuit was contradictory to the above mention laws.

The ruling from district USDC on the case 10 cv. 7296 estoppel, which relied on US Patent 4/201,013 by Wierma was contradictory to US 840 Patent scope that include tools, (soft and hard wares) technology and mobility.

The finding of estoppels and Appeals court in the case number 12-1405 construction of the scope of the claim without the claim section of audio equipment, which include audio video and equipment like planar panel, or TV, monitor, screen, computer, cell phone, Camera, blue tooth, out lets, writing board, black board, white board, ELECTRIC BOARD, soft ware and hardware like base, screw, screw driver, clip, resilient arm, clip arm, clamps, bolt, brackets, or USB Cable, adapters, mouse, remote control, and Ethernet adapters or amplifiers, speakers, etc. was wrongful

I learned and respectfully state that the ruling from the lower courts like case number 1.15 cv.02465 LTS, and 11-cv. 06187 contradict US 840 in technology and tools also citing or relying on US patent 4/201,013 was wrongful. The court claim construction eliminates claim section for technology, please see claim section, Page 6, paragraph 3, line 1 to the end, the claimed connector/interconnection is claim of the technology and it have change the scope of the book holder.

THE MEANING OF CONNECTOR AND OR INTERCONNECTOR

“An interconnector is a network system that allows you to become connected to a televised program through a wire, wireless telephone, television, computer, camera, audio video printer, or copier Services”

This has stated a plausible claim

On Chikezie Ottah V. National Grid, 19 Civ. 08289 (PAE)(RWL) I respectfully thank the court for acting on claim construction I submitted, the court finally recognized the technology and it claimed elements in the claim, example the connector or and interconnector, it is a sophisticated language to claim huge amount of electronics, there soft ware and hardware in a simply one name. I respectfully state that the electronic or technology and other items were writing all over the specification, please see Fig. 1, paragraph 1, page 2, line 5 to 8, US Patent 840, another example where technology and electronic was individual mention was on Fig. 8, paragraph 3, page 5, line 2 to 4 US Patent 840, anothers.

I respectfully thank the court for understanding that those electronics, or technologies, and the items are collectively interconnectors or connectors, the book holder is built on the demand of the user, example an interconnector or connector have a laptop or camera, the soft ware and hard ware (example electric cable or screws) to mount the camera on a mobile vehicle, please see the summary of invention, page 2, paragraph 6, 7, 8, 9. They are relevant to this case. I regret the court passed a good

opportunity for a guilty verdict against National Grid, my claim construction was good enough for a guilt verdict, because the claim was plausible.

Chikezie Ottah V. Verizon, case number 19 Civ. 8552 (LT) I respectfully thank the court for acting on claim construction I submitted, like the appeals court of Circuit Judges of DYK, Omalley and Mayer, they recognized that, the earlier court rule on removable attach, or removable and securd was incorrect, now and before. the court finally recognized the technology and it claimed elements in the claim, example the connector or and interconnector, it is a sophisticated language to claim huge amount of electronics and there soft ware and hardware in a simply one name, example an interconnector or connector (Plausible) have a laptop or camera, the soft ware and hard ware (example electric cable or screws) to mount the camera on a mobile vehicle with book holder, removably attach, please see the summary of invention, page 2, paragraph 6, 7, 8, 9. They are relevant to this case. I regret the court passed a good opportunity for a guilty verdict against Verizon, my claim construction and summary Jugdment was good enough for a guilt verdict, because the claim was plausible.

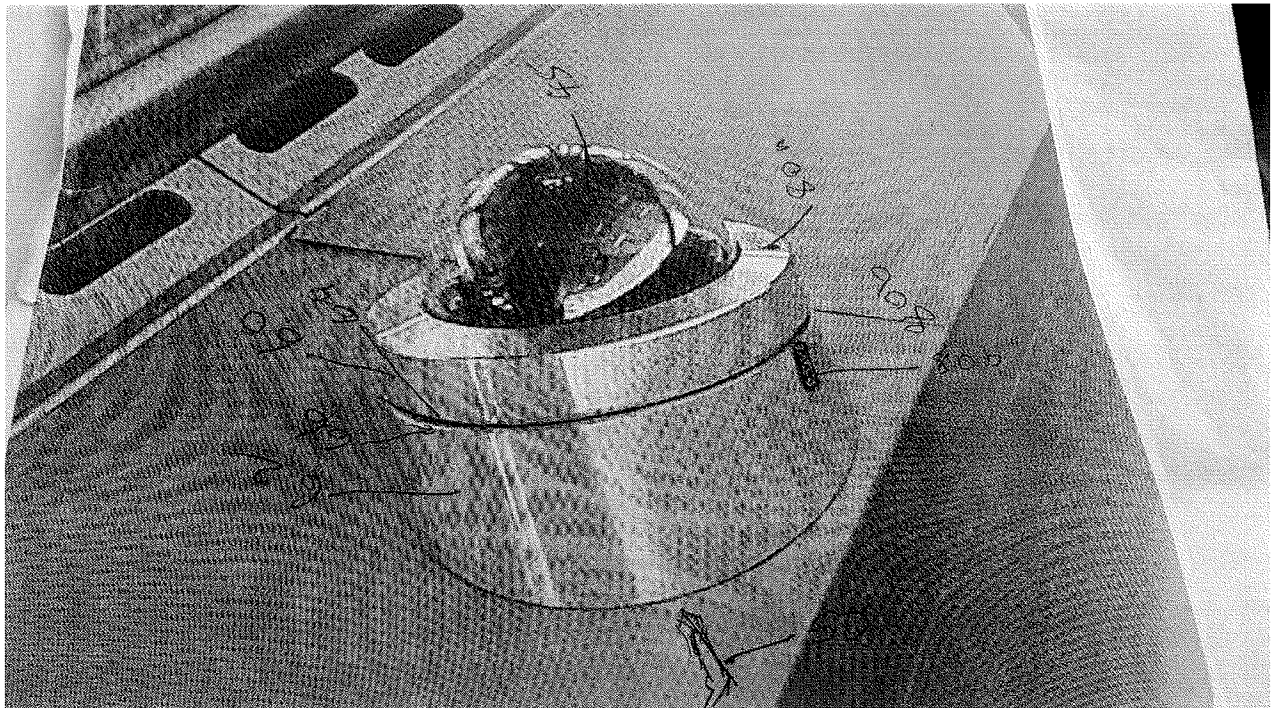
THE DEFENDANT PRODUCTS

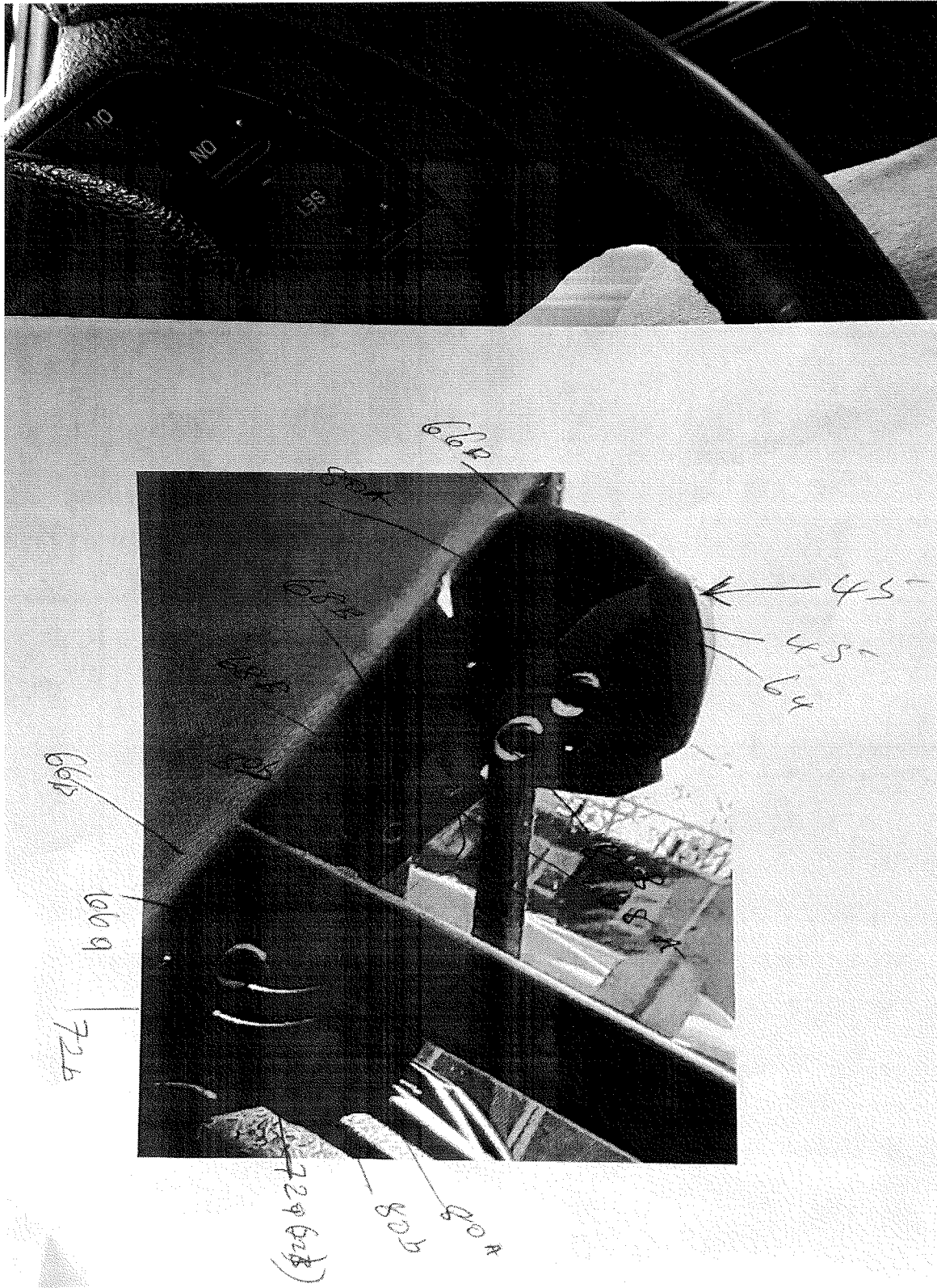
INFRINGEMENT UNDER THE DOCTRINE OF EQUIVALENTS

FURTHERMORE NO PRIOR ART HAVE THIS TELESCOPIC ARRANGEMENTS.

1. It is another object of the present invention to provide a connector means for removably /securing a book to the book holder in a reading position
2. axial adjustment for adjusting the spacing between clasp and the book support
3. rotational adjustment between the clasp and the book support,
4. pivotal adjustment between the clasp and the book support , for is not obvious in the light of prior art

R h





, Fig. 3, paragraph 1, page 3, line 1 to 9, it state, "an alternative arm 314 comprise a concentrically mount square tube member 60 is adapted attach to a

book support platform (12.FIG. 1) on one and slidable insert into member 62 with the other end. The male member 60 is adapted for separable, concentric interconnection with the female member 62 to form a telescopic arrangement for axial adjustment. Telescopic arrangement; the 60 the male and 62 female are concentrically separated, with the female 62 specially equipped with 45 a lens, attached to a sensor, 45 the sensor equipped with an IP attach to DVR is attached memory and attach to a battery, the SENSOR encoded IP information enter concentrically 50 network through cable 50 serial port or ether IP address, the IP address through network locate it IP receiver planar or TV, the user will adjust the translate the encoded picture into pictures and the owner will telescopically arrange the picture to the best position for his best view. The remote can adaptable select the page axially, or a rotational adapting the pages.

The male 60 casing is concentrically reattached 62 until the 66a male lid is on a the 62 female 66b lid, the two lips 66a and 66b, at their last groove of the concentric mounting, the male 60 and the 62 female have a predetermined holes 80a and 80b, the owner will fix the male and female with a screw connector and secured onto the vehicle to begin sending or exchange media.

THE COURT ALL ME TO USE THE CLAIM WORDS, IT IS PLAUSIBLE THE CLAIM OF THE TECHNOLOGY. While the ordinary meaning of claim language as understood by a person of skill in the art may readily appear even to a lay Judge, claim construction in such cases involves little more than the application of widely accepted meaning of the commonly understood words. The uses of technology have been well documented,

NO CONTRADICTION ON THE ADJUSTABLE USE OF TOOLS/RESILIENT CLIP

It is another object of the present invention to provide a connector means for removably/securing a book to the book holder in a reading position. See US Patent 840, summary of invention, page 2.

The word secure as seen in the objective of the invention, means in a Dictionary Fix or Fasten so as not to give way, become loose or be lost.

“Check to ensure that all nuts and bolts are secure” “footnote Oxford Dictionary”

Your Hon.

*It is another object of the present invention to provide a clasp comprising a clip having an adjustable, resilient clip for removably attaching to mounting structure on the mobile vehicle.

DISPUTED ADJUSTABLE RESILIENT CLIP: This is relevant. Because the defendant has been making the product that function the same way US Patent 840 function with an adjustable resilient clip, with an adjustable bracket, base, screw, bolt, wire, screwdriver (bolt and or ridge groove hole) or cork groove and corkscrew, or and cable with copper conductor, semiconductors cable. This is a claim for patent infringement and a claim for relief that is plausible, T wonmbly (citing bell Atlantic Corp V. Twombly 550 US 544, 570, 127 S,ct.1950 167 L Ed2d 929 (2007) and Fed R,Civ.P.8.

SEE US PATENT 840, PAGE 6,

Although the invention has been described above described above in connection with particular embodiment and examples, it will be appreciated by those skilled in the art that the invention is not necessarily so limited and that numerous other embodiments, example, uses, modifications and departures from the embodiments, example and uses are intended to be encompassed by the claims attached hereto. The entire disclosure of each patent and publication cited herein is incorporated by reference, as if each such patent or publication were individually incorporated by reference herein.

SUBMITTED TO USPTO

The applicant submits that the invention is not anticipated by the prior arts ,Furthermore the use of adjustable resilient clip on the clasp for clasping the book holder without tools, axial adjustment for adjusting the space between the clasp and the book support , rotational adjustment on the arm between the clasp and the book support, pivotal adjustments between the clasp and the book support for is not obvious in the light of prior arts.

Relevant to adjustment and arrangement of tools/ history of Prosecution estoppel
From summary of invention

It is another object of the present invention to provide a clasp comprising a clip having an adjustable resilient arm for removably attached to a mounting structure on the mobile vehicle.

Relevant to the technology and book, modification/adjustable of equipment. It is another object of present invention to provide a support platform adaptable for use as a writing board.

Relevant to adjustably tool, and Modification of technology and equipments

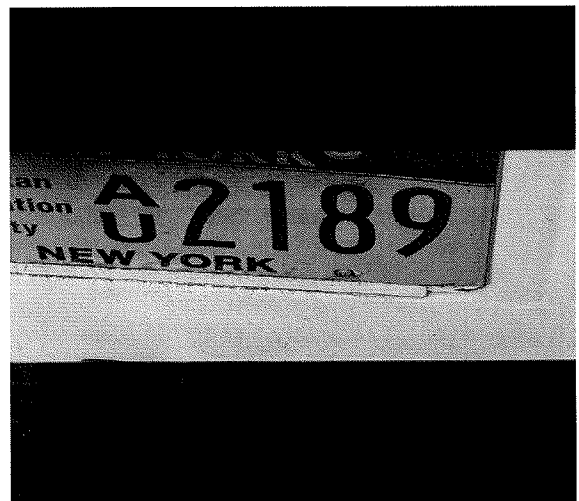
It is another object of the present invention to provide a connector means for removably securing a book to the book holder in a reading position

Your Hon. The defendant is blindsided to only one function of an adjustable resilient clip/arm. Let me approach the term adjustable resilient clip from another view., the summary of invention States "it is another object of the present invention to provide a clasp comprising a clip having an adjustable resilient arm for removably attached to a mounting structure on the mobile vehicle. " with clarity, no ambiguity, or informalities the summary of invention States to provide a clasp comprising a clip/scREW/cable having this adjustable resilient tools to assemble or secure the bookholder.

The Term Adjustable resilient Clip. See, Fig. 4,. Brief description of drawing, Fig.4, is a side perspective view of the book holder of Fig. 1, illustrating an alternative clip arrangement. The defendant can stop been willingly blind.

Fig. 4, illustrates a book holder 410 comprising a book support 412 and a support arm 414. The support arm 414 comprises a clasp 15, lower section 73 and an upper section 75, the clasp comprises an adjustable clip 70 mount on the lower

section 73, the adjustable is rotatable with respect to the arm 414 to removably attach the book bolder 410 to a vertical or horizontal object(eg. Pole not shown) on the mobile vehicle. The arm connector 415 rotatable and slidably attached the lower section 73 of the supporting arm 414 to the upper 75, the upper section 75 has pivotal connector 420 on the (Fig. 4) book support 412. The clip 70 has adjustable clip arms to allow different sizes of objects to be attached to the book holder 410. The position of the clip arm 74a, 74b along the clip body 78 can be selectively fixed by a screw 415.



DEFENDANT MISLEAD THE COURT

Your Hon. See Ottah V. VeriFone, NO. 11-CV 06187, SLIP OP. AT 4, wl. 4841755(SDNY, Oct. 10) and the rest of the cases in the district the court ruled and explained VeriFone mounts are “riveted in place to the taxi’s vehicle seat or and partition, and are not of the removable nature described by the claim.

Relevant to the patent is this objective of the invention,

*It is another object of the present invention to provide a clasp comprising a clip having an adjustable, resilient clip for removably attaching to mounting structure on the mobile vehicle.

Facts in the claim. An adjustable clasp (or rivet) mount on slidable or recyclable, twirlable, axially adjustment forward or backward telescopic arrangement, further the claim also stated the second end pivotally attached to the book support platform, the telescopic arrangement interconnecting the first end to the second end .

Facts in the Pivotal/ interconnection, An adjustable cable, wire, ports, sensors, nut, bolt, screw, screwdriver, corkscrew, corkscrew driver, groove, groove hand free removal. Attachment or and secure.

Jockmus V. Leviton, 28F,2d, 812, the description of the invention and picture or drawing can be relied on in combination to understand what the reasonably claimed.

DURING PROSECUTION: one of the adjustable element mention was Pivotal adjustment, (an adjustable cable , wires, mouse, sensor, camera, combination of tools, and nuts and bolt. Or an adjust see below

The applicant submits that the invention is not anticipated by the prior arts ,Furthermore the use of adjustable resilient clip on the clasp for clasping the book holder without tools, axial adjustment for adjusting the space between the clasp and the book support , rotational adjustment on the arm between the clasp and the book support, pivotal adjustments between the clasp and the book support for is not obvious in the light of prior arts.

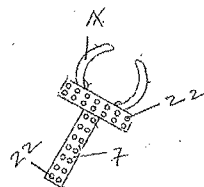


Fig. 5

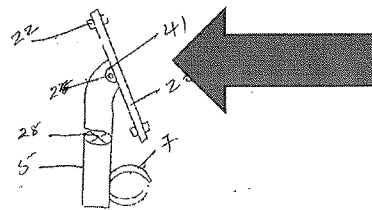


Fig. 4

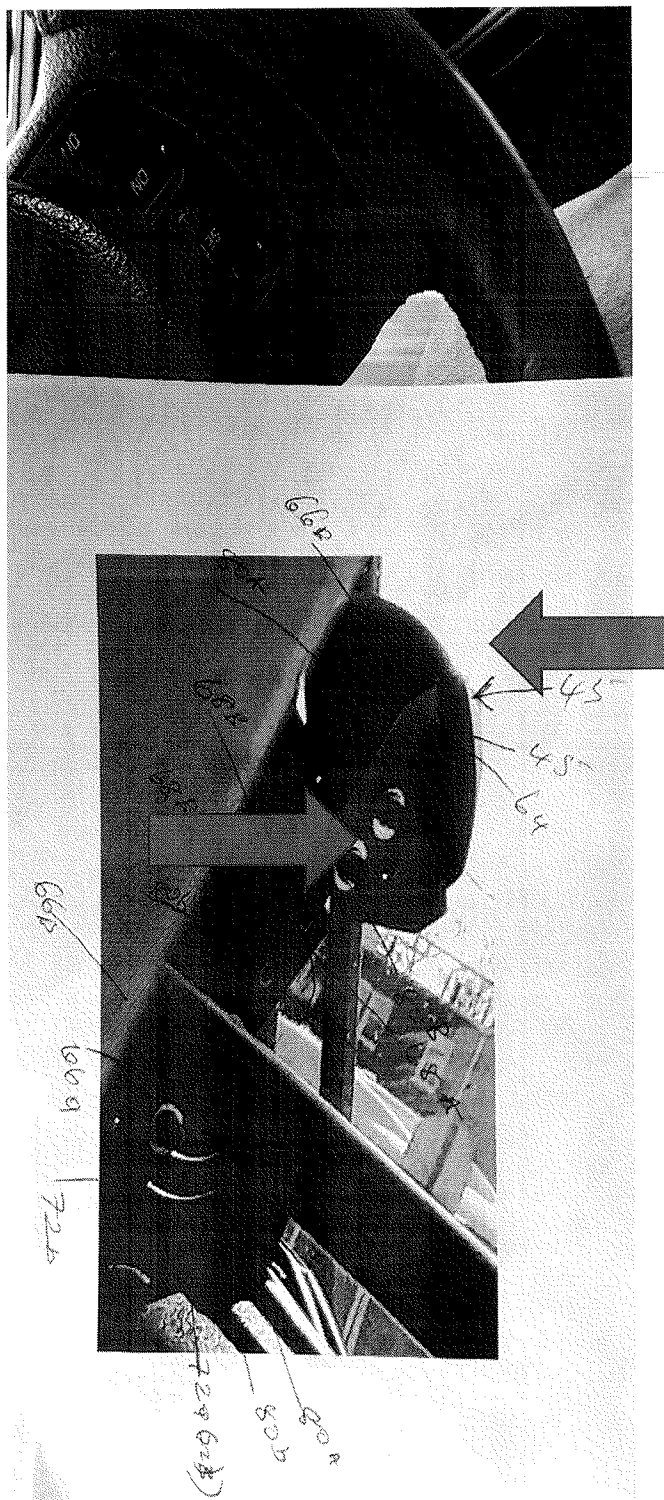
see the instant case

Facts in the Pivotal/ interconnection, An adjustable cable, wire, ports, sensors, nut, bolt, screw, screwdriver, corkscrew, corkscrew driver, groove, groove hand free removal. Attachment or and secure.

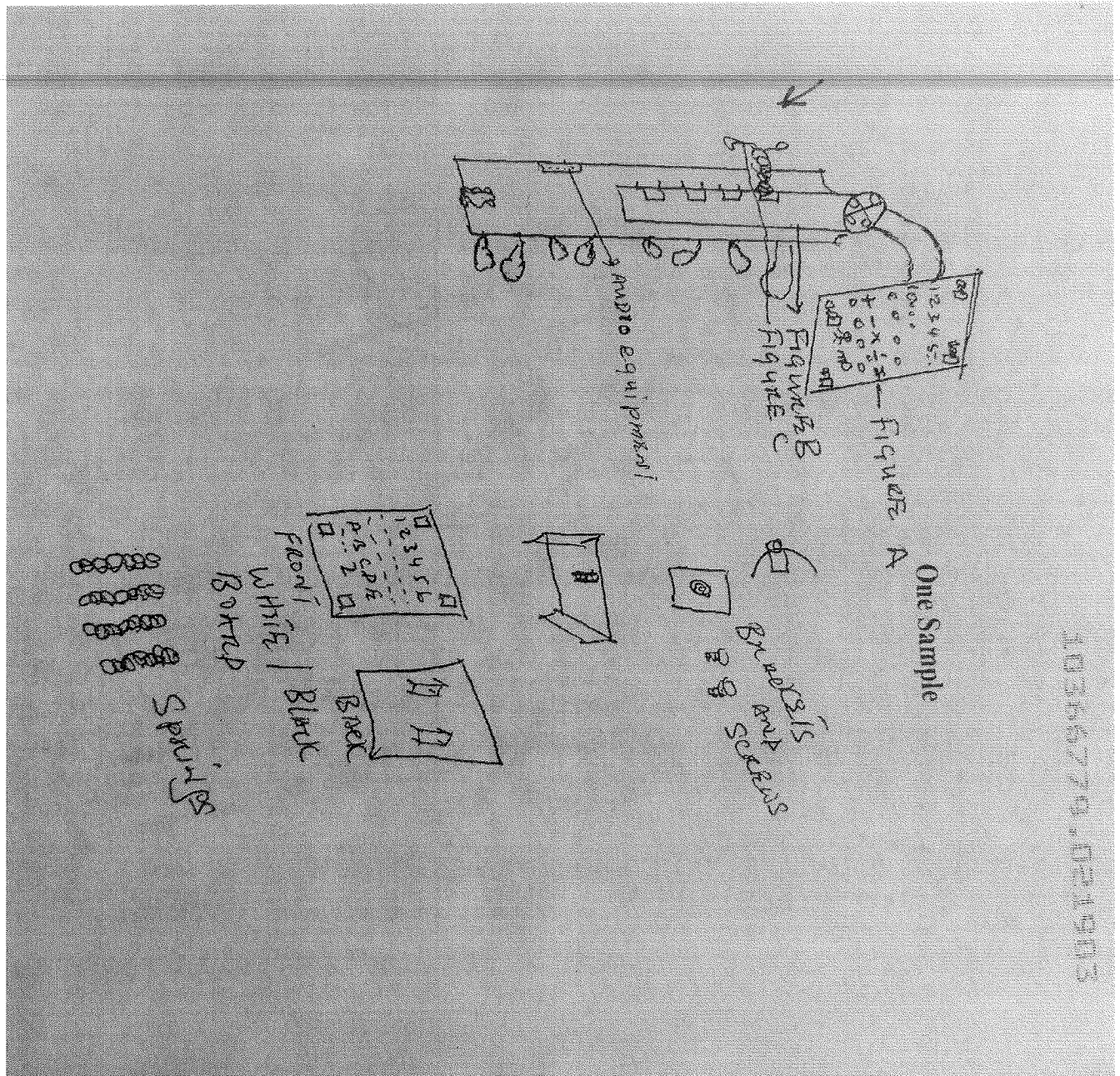


ON THE INSTANT CASE

Facts in the Pivotal/ interconnection, An adjustable cable, wire, ports, sensors, nut, bolt, screw, screwdriver, corkscrew, corkscrew driver, groove, groove hand free removal. Attachment or and secure.



MARKED IN THE INSTANT CASE



PROSECUTION HISTORY

Adjustable resilient clip, electronic and equipment , pivotal interconnection or and connector, Adaptable platform audio/equipment are the same.

AN ADJUSTABLE :

"ABLE TO CHANGE TO SUIT A PARTICULAR NEED (FOOT NOTE, WEBSTER DICTIONARY)

The new tool comprises: a base with holes, a screwdriver, Screws, corkhold, a corkscrewdrivee, ring, ring sliding arm, grove hole, grove slidingcork, silver cable, copper cable, Gold cable, wire or wireless, base and holes, key board, mouse, sensor.

This is new tool , the prior art is late

The smart tools is new in the light of the prior art, example the electronic cable, mouse, keyboard, sensor, and there electronics/technology

This tools are also inside the claim

This tools are also inside specification

This tools are also inside the history of Prosecution

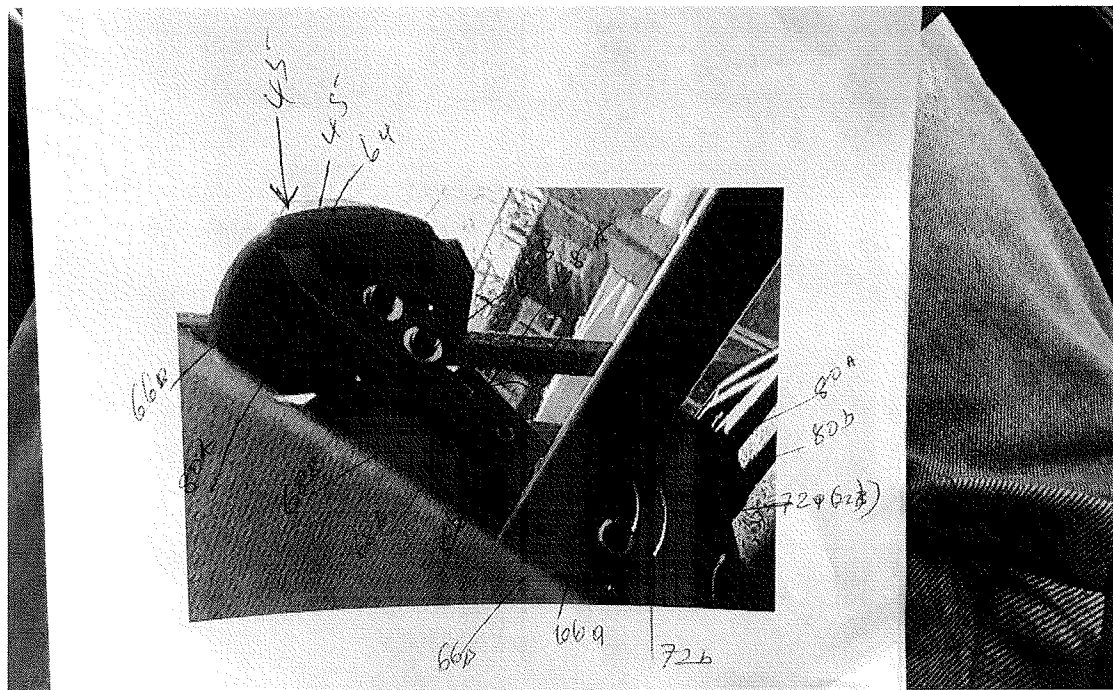
The defendant is aware, it was rewritten in the complaint. See the defendant in the memorandum to dismiss my complaint case number 22 cv 02935 PAE-RWL. Page 16, paragraph 1, the court, in plaintiff prior action against National Grid, relied on the above decision hold that the plaintiff s claim that a vehicular laptop mounting device in defendant van infringed on the 840 patent was a legal implausibility. The court errs because the defendant and others mislead the court into thinking that resilient clip/arm is stressing no tools.

Example if a book holder require a modified and adjustable secured base, a sensor attached to a book support platform, and a camera/sensor pivotal connecting A/C, the sensor/camera interconnecting to network program to a display in the MTA central station.

The sensor/camera report on each bus on the state of the bus before an emergency, capacity, weight, sickness, repair work, if any . all tools/technologies are adapted for functioning of the bus in the view of the make, model and terrain.

IT IS UNDISPUTED AN INFRINGEMENT UNDER THE DOCTRINE OF EQUIVALENT

In conclusion, see Fig.3, (ref. 12, 1) Alternative arm. the special feather of claim 32 are camera and it element concentrically link to a planar panel, the telescopic arrangement are through soft ware media encoding, rotating, and axial positioning of the page or book are completed with plug and play software. The experts in this field understand there is no informalities.



RESILIENT CLIP IN THE ACCUSED PRODUCT IS A VIOLATION

Your Hon. in the defendant camera holder or BookHolder , the projected pin like instrument is 80a the resilient clip 80b arm, for physical 80b axial adjustable 68a in relation 62b to the 72a claspe (a 72a bracket base) and the pivotal 45 camera platform. The top two 80b resilient clip are responsible for adjustment of the 45 camera, a simply press on the top pin buttons or top 80b resilient clips will adjust the read position of the 45 camera, for the 45 camera to be revised backwards, press on the 80a resilient clip you can quickly and easily removably or reattached a 45 camera without tools (screw), is it a fact in light over the prior art and a cause of infringement against the defendant. Furthermore, with an protract 50 connector or 45 interconnector 80b holder or 72b fixed to mount the 45 planar, or 45 TV and interconnecting 45 the planar to a 45 camera 50 network system, the 50 network system operating system 50 remote control can 50 telescopically adjustable the 45 pages in the 45 planar 50 axially, 50 rotational and 72b fixed the e book by 50 scroll the mouse, using 50 IP address, not a 72b screw, is it not in the light of prior art and in the light an infringement against the late products like the defendant product. This is an issue of material facts, a state of claim for relief

Your Hon. the defendant miss conduct adjustable it product for telescoping with resilient clip is a violation of US Patent 840, it is obvious in the light of the accused product, by applying 80b resilient clip the product axially change position, or rotational positioning without screw driver, adjustable pivotal cable, sensor, flexible pins, screw and screwdriver connections to the camera,

• .

THE CONJUNCTIVE WORD IS ADJUST/ADJUSTABLE

Now here is the relevant claim section, another modification, Claim 1, page 6, paragraph 3, line 5, Where in book holder is removably attached and adjusted to a reading position by telescopic arrangements axially adjusting the space relation between book support platform and clasp and the pivotal connection on the support platform pivotally adjusting the front surface with respect to the arm. This means that book holder can be removable and attached electronic or elements. In modification the word adjustable is powerful, for example it means change of elements or tools, or adjusting to a resilient tool that allow rotational and hold of the book holder's arms and or platform, the combination of the resilient tools that allow axially movement of that book holder's arm and platform, adjustable the base may be fixed inside a driverable vehicle by a screw member, please see the attached dictionary mean, it is a fact plausible claim for a relief.

TREND OF THE CONJUNCTIVE WORD, LIKE ADAPTABLECONNECTORS/INTERCONNECTORS AND INCORPORATE REFERENCE (12,FIG.1)

The pivotal connection on the support platform surface....(Eg securing cable, wireless or wired, laptop, computer, TV, camera, cell phone, phone, scanner, printer, copy machine, black board or general planar panel.) pivotally ADJUSTING the front with respect to the arm

Here in the claim section above, the word ADJUSTABLE and A CONNECTOR in modification is straightforward, the connector or interconnectors provide the scope for both book and computer changes, attached to the front platform, the connector or interconnectors provide the computer to adjustably remove the book and attach the computer, this is a fact and a plausible configuration, see Fig. 3, page 3, paragraph 1. Line 1 to 7, with reference to (12, Fig. 1). AND Fig.4, page 2, paragraph 4, it states, Is a side perspective view of book holder of Fig. 1, illustrating an alternative clip arrangement, this is a proof book holder have more than one way of mounting, REF. (12, Fig), please your Hon. See Fig. 8, (ref. 12.Fig. 1) Paragraph 3, line 8. And 27, page 5, it state the book platform 12 may be used to support such items as audio/video and equipment, PDA, mobile phone,

THE CONJUNCTIVE WORD IS ADJUST/ADJUSTABLE

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FURTHER TO INFRINGEMENT UNDER THE DOCTRINE OF EQUIVALENTS

THIS IS WORD FROM 1ST EMBODIMENT.

See Fig.1 illustrated a book holder assembly 10 according to the 1st embodiment of present invention. The book holder 10 comprise a book platform 12 and an adjustable arm 14 and a 15 clasp. The book platform 12 includes a generally planar panel 16 (12 general planar panel, include computer, camera, radio, television, telephone, cellphone, video and audio) having a front 18 and a rear surface 20. The front surface 18 is configured to hold a book or suitable for use as a writing , drawing ,white, black, electronic board, computer, laptop, camera, telephone, cellphone, phone, television audio video equipment . The rear surface of 20 book platform 12 is attach to the adjustable support arm 14 at an angle suitable for reading. See the meaning of the adaptable, connector or interconnector above, the meaning of those words read the same meaning in the specification.

The specification describes the claimed book holder and its removable and attachment, relevant to this suit, the specification ended, just below to the claim, state that the book holder may be used to hold this items other than the books: the platform 12 may also be used to support such items as audio video and equipment, PDAs, Mobile phone, camera, computers, musical instruments, toys, puzzle, games, the panel 16 may be provided with a set of mounting positions for receiving and or mounting the above items.

BRIEF DESCRIPTION OF THE DRAWING.

~~A description of the infringement illustrated using words from alternative Fig.4.~~

Fig. 4. See the publication in US Patent Appl. Number 10/366,779, date July 25 2005, page 33 to 38, paragraph 2.

[0020] Fig. 4. Is a side perspective view of the book holder of Fig. illustrating an alternate clip arrangement; this are the claimed embodiment in Fig.4

Illustrating a 20 book or 45 audio video equipment support, and support 3 arm. The support arm comprise a 7 base, a lower section 5 and upper section 3, the lower 5 arm comprise of 7 and 22 holes is removable by 7 screw means; 7 screw thread 7 base to a vertical or horizontal object(a pole) on the mobile vehicle/ the 5 arm 28 connector rotatable or slidably attach to the lower of the 5 supporting arm to the upper 3 section. The upper 3 arm section has pivotal 41 connectors or 50 inter connectors. The base was modified from the shown clip body in Fig. 5, please see the exhibit 1 and 2, and the claim for the definition of a clip body,

Legal

The design product from US patent 7,152,840, is identical to defendant product seen in all the, design, elements or equivalent are the same.

The design product from US Patent 7,152,840 and defendant product seen in all the elements or equivalent are the same, and function the same way, production the same, the description above said it all. The plead is justified according to Fed.Civ.P. 8(a)(2) it is a fact any jury will convict the defendant. The defendant products in picture and already exist, see US Patent 7,152, 840.

We demanding 50 million for the above mention infringement.

Off to
12/9/22

UNITED STATES DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF NEW YORK.

CHIKEZIE OTTAH

V.

M T A

Pro se office

CHIKEZIE OTTAH

648 DOROTHEA LANE, NEW YORK

11003, USA

M T A

2 BROADWAY

NEW YORK, NEW YORK

10004





1. A book support platform, the book support platform comprising a front surface, a rear surface and a plurality of clamps, the front surface adapted for supporting a book, the plurality of clamps disposed on the front surface to engage and retain the book to the book support platform, the rear surface separated from the front surface:

FIGEMENT BY CLAIM WORD.



1. A book support platform, the book support platform comprising a front surface, a rear surface and a plurality of clamps, the front surface adapted for supporting a book, the plurality of clamps disposed on the front surface to engage and retain the book to the book support platform, the rear surface separated from the front surface:



the front surface adapted for supporting a book,/ COMPUTER or SENSOR



adaptable 🔊

/ə'dæptəbəl/
adjective

Save



[more adaptable; most adaptable]

: able to change or be changed in order to fit or work better in some situation or for some purpose : able to adapt or be adapted

- an *adaptable* tool that combines a screwdriver, a corkscrew, and pliers
- very *adaptable* animals

[−] Hide examples

— often + to

- These plants are all easily *adaptable* to colder climates.
- The computer program is *adaptable* to the needs of individual users.

[−] Hide examples

— **adaptability** /ə.dæptə'bɪləti/ 🔊 noun





the plurality of clamps disposed on the front surface to engage and retain the book to the book support platform



the rear surface separated from the front surface:



2. A clasp comprising a clip head, a clip body, a pair of resilient arms, the clip arms adjustably mounted on the clip head and attach to the clip body, and



a clip head



, a pair of resilient arms



adjustably mounted on the clip head and attach to the clip body, and
THE ADJUSTABLE BRACKET SCREWED DOWN ON THE BUS FRONT
STRUCTURE AND A SIDE RESILIENT CLIP/PIN



. An arm comprising a first end and a second end and a telescoping arrangement, the clasp on the first end, the second end pivotally attached to the book support platform, the telescoping arrangement interconnecting the first end to the second end, the clasp space from the book support platform, wherein the book holder is removably attached and adjusted to a reading position by the telescoping arrangement axially adjusting the space relation between the book support platform and the clasp and the pivotal connection on the book support platform pivotally adjusting the front surface with respect to the arm.



a telescoping arrangement, the clasp on the first end, the second end pivotally attached to the book support platform, the telescoping arrangement interconnecting the first end to the second end,

NOT SHOWN: THE ARROW IS DIRECTED TO THE CABLE CONNECTION TO THE SENSOR (a tool/ electronic equipment) OR CAMERA (electronic/ technology) MOUNTED IN THE BUS, DC FROM THE BUS MODULE (tool) CONVERTED TO AC (SENSOR OR) TO THE CAMERA POWER.

AN ADAPTABLE CONNECTOR OR INTERCONNECTOR; IS A TOOL IN COMBINATION OF OTHER TOOLS

THE BASE IS ADJUSTABLY CLASP, SCREWED TO THE BUS FRONT STRUCTURE, AND ADJUSTABLE TELESCOPIC ARRANGEMENT, ADJUSTING ON THE BOOK HOLDER axially (AXIALLY) FUNCTION

THE SENSOR/CAMERA COMMUNICATE INFORMATION FROM THE BUS TO THE COMMAND CENTER, EXAMPLE NUMBER OF OCCUPANCY, INFORMATIONS ON OTHER SAFETY DEVICES FOR THE BUS TO PERFORM WELL AND REPORT TO THE COMMAND.

The sensor and or the camera in MTA Bus interconnection to distribute data and voice to TV or display screen to the central monitoring center.



wherein the book holder is removably attached

THE REMOVABLY ATTACH OCCURS AT THE POINT WHERE THE UPPER ARM/BOX SLIDE INTO THE LOWER ARM/BOX, A DEFLEX OF THE ADJUSTABLE RESILIENT CLIP/PIN WILL REMOVE ATTACHMENT FOR AN EASY REMOVAL OR ATTACH OF THE ARMS. THIS IS UNDISPUTABLE SIGNATURE OF BOOK HOLDER.

THE COURT SAID THEY WANT TO SEE THE REMOVAL AND ATTACHED WITHOUT TOOL

ANOTHER UNDISPUTABLE FUNCTION OF BOOK HOLDER IS AN ADJUSTABLE REMOVAL OR AND ATTACH OF AUDIO EQUIPMENT, EXAMPLE CABLE, USB, WIRES, SERIAL PORT, KEY BOARD, MOUSE, DC/AC CONNECTION, DATA OR MEDIA INTERCONNECTION.

Your Hon.

This is relevant, the book holder also have hard ware in audio equipment, the court has in the past been mislead by the defendants on the scope of a connector, or interconnector or and audio equipment, all the known meaning and definition of the above words have the scope of software and hardware.

Example see US Patent 840, Summary of invention number 10, it State, **It is another object of the present invention to provide a connector means for removably / securing a book to the book holder in a reading position.**

Your Hon. The Connector or interconnector have undisputable electronics which need various tools



and adjusted to a reading position by the telescoping arrangement axially adjusting the space relation between the book support platform and the clasp



and the pivotal connection on the book support platform pivotally adjusting the front surface with respect to the arm.

THE RESILIENT CLIP/PIN ADJUST THE CAMERA LENS AND THE SENSOR AUTOMATICALLY TAKE THE PICTURES, AND AUTOMATICALLY INTERCONNECT THE DATA TO THE MONITORS IN THE CENTER FOR THE SAFETY OF THE RIDERS.

THE CAMERA HARDWARE AND SOFTWARE CORPORATE FOR EFFECTIVE AND SMOOTH FUNCTION OF THE BUS SERVICE. FOR LITERAL INFRINGEMENT ANY JURY WILL FIND THE DEFENDANT GUILTY AND THE SAME IN EQUIVALENT.

CLAIMED ELEMENTS OF US 840;

1. A book support platform, the book support platform comprising a front surface, a rear surface and a plurality of clamps, the front surface adapted for supporting a book, the plurality of clamps disposed on the front surface to engage and retain the book to the book support platform, the rear surface separated from the front surface:
2. A clasp comprising a clip head, a clip body, a pair of resilient arms, the clip arms adjustably mounted on the clip head and attach to the clip body, and
3. **An arm comprising a first end and a second end and a telescoping arrangement, the clasp on the first end, the second end pivotally attached to the book support platform, the telescoping arrangement interconnecting the first end to the second end, the clasp space from the book support platform, wherein the book holder is removably attached and adjusted to a reading position by the telescoping arrangement axially adjusting the space relation between the book support platform and the clasp and the pivotal connection on the book support platform pivotally adjusting the front surface with respect to the arm.**

UNITED STATES DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF NEW YORK.

CHIKEZIE OTTAH

V.

M T A

Pro se office

CHIKEZIE OTTAH

648 DOROTHEA LANE, NEW YORK

11003, USA

M T A

2 BROADWAY

NEW YORK, NEW YORK

10004

A handwritten signature in cursive script, appearing to read "Ottah", with a horizontal line drawn through it.

AN ADJUSTABLE :

"ABLE TO CHANGE TO SUIT A PARTICULAR NEED (FOOT NOTE, WEBSTER DICTIONARY)

The new tool comprises: a base with holes, a screwdriver, Screws, corkhold, a corkscrewdrivee, ring, ring sliding arm, grove hole, grove slidingcork, silver cable, copper cable, Gold cable, wire or wireless, base and holes, key board, mouse, sensor.

This is new tool , the prior art is late

The smart tools is new in the light of the prior art, example the electronic cable, mouse, keyboard, sensor, and there electronics/technology

This tools are also inside the claim

This tools are also inside specification

This tools are also inside the history of Prosecution

The defendant is aware, it was rewritten in the complaint. See the defendant in the memorandum to dismiss my complaint case number 22 cv 02935 PAE-RWL. Page 16, paragraph 1, the court, in plaintiff prior action against National Grid, relied on the above decision hold that the plaintiff s claim that a vehicular laptop mounting device in defendant van infringed on the 840 patent was a legal implausibility. The court errs because the defendant and others mislead the court into thinking that resilient clip/arm is stressing no tools.

YOUR HON.

According to History of Prosecution, both written and drawing said connector, interconnector, adaptable, and audio/equipment is the same.

number 1

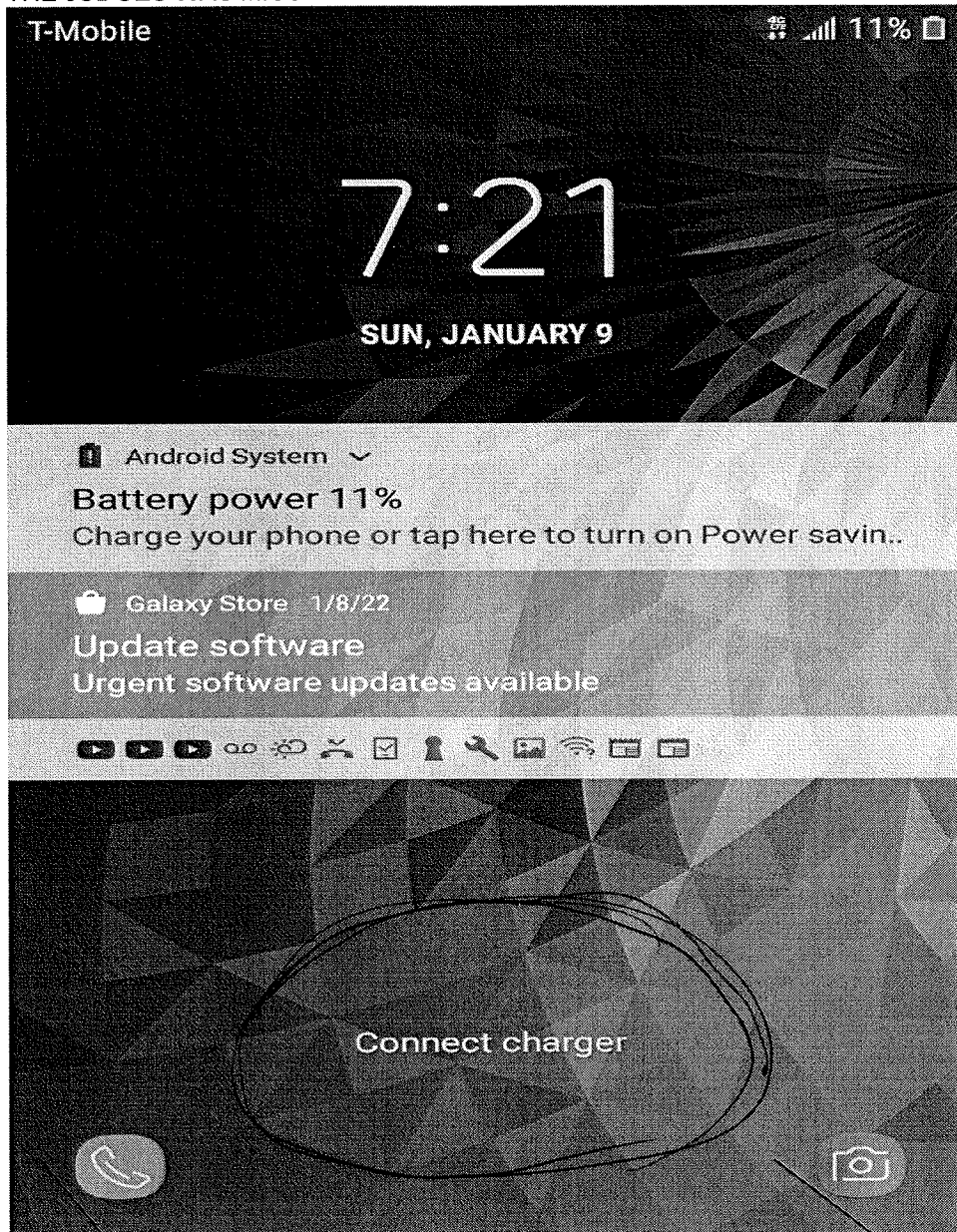


According to the specification, all the many mention and context of technology was rooted in the history of prosecution, I request permission from USPTO to transfer test of claimed technology and shown in the attached drawing of number 4. And written in claim, and shown now on number 5.

The claim has the words shown in the specification and the meaning is the same please the attached dictionary means and the process.

The defendant is guilty, violation of 35 USC 270. Please your hon. You can OVERTURN the previous defendant claims.

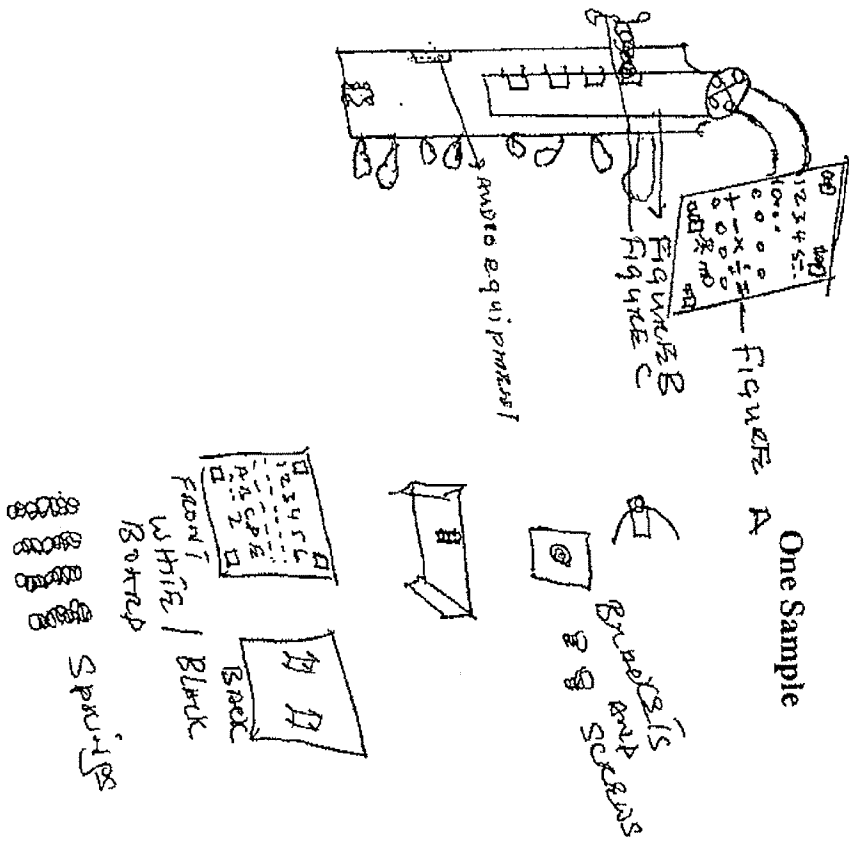
Conjunctive word adjustable is trending and not tool is after the fact
 The Claimed Connector is plausible, transmitting media to laptop, cell phone, camera, computer and others The applicant submits that the invention is not anticipate by the prior arts, further the use of ADJUSTABLE resilient clip arm on the clasp for clasping the book holder on a movable vehicle provide quick removal and attachment without tools, axial adjustment for adjusting the space between the clasp and the book support, rotational adjustment on the arm between the clasp and the book support, pivotal adjustments between the arm and the book support for is not obvious in the light of the prior art.
 THE JUDGES WAS MISS LEAD IN THE LANGUAGE ABOVE.



Cell phone

no tool cable transmit media to the laptop/camera

ADJUSTABLE, MEANS UNRESTRICTED TOOL comprising cork-screwdriver, corkscrew, cable-cork tip, cable-corkpin, ports, USB Ports, screw, nut, bolt, etc.



10366779.021903

10366779 .021003

population. Again any body can use it, like the beach goers, all you need to do to use noon-start is push the grabbing instrument into your structure, be it chair, stroller, back, front, or a car carriages, dolls, toys, and our technology will include electronic boards.

The economic importance of noon-start is it is a stimulant to kid's attention and behaviors, the use of noon-start can captivate the kids because the kids will be with their loved symbols, famous characters like micky mouse, bunny(bugs/Easter bunny). As a head start product kids have the advantage of molding their reading and writing habit, and recognize symbols, picture and use audio equipment to sing and play.. The kids can perform this activities on a strollers at the buses, trains, stroller, carriages, bed, on the floor, at the beach, etc.

CLAIMS.

I Chineye Ottah and Kon worryz Corporation are claiming priority with noon-start as a head -start product and a book holder targeted to structures use mostly by children.

Noon-start is the first head-start product on children strollers, carriage, bed, chairs and on the floor that help mold the kids reading writing, singing and playing habits.

The product give the kids advantages in learning because noon-start can be use by kids in any environment, at the bus stop, train, at the park, at the beach, restaurant, at school, and at home. Reading, writing, singing, and playing with books and/or audio equipments. ✓

Noon-start is a book holder. ↖

U.S. Patent

Dec. 26, 2006

Sheet 3 of 4

US 7,152,840 B2

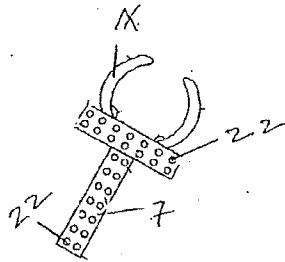


Fig. 5

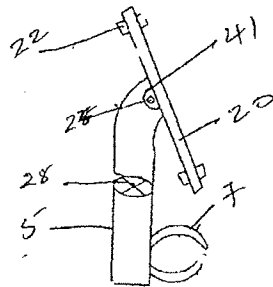
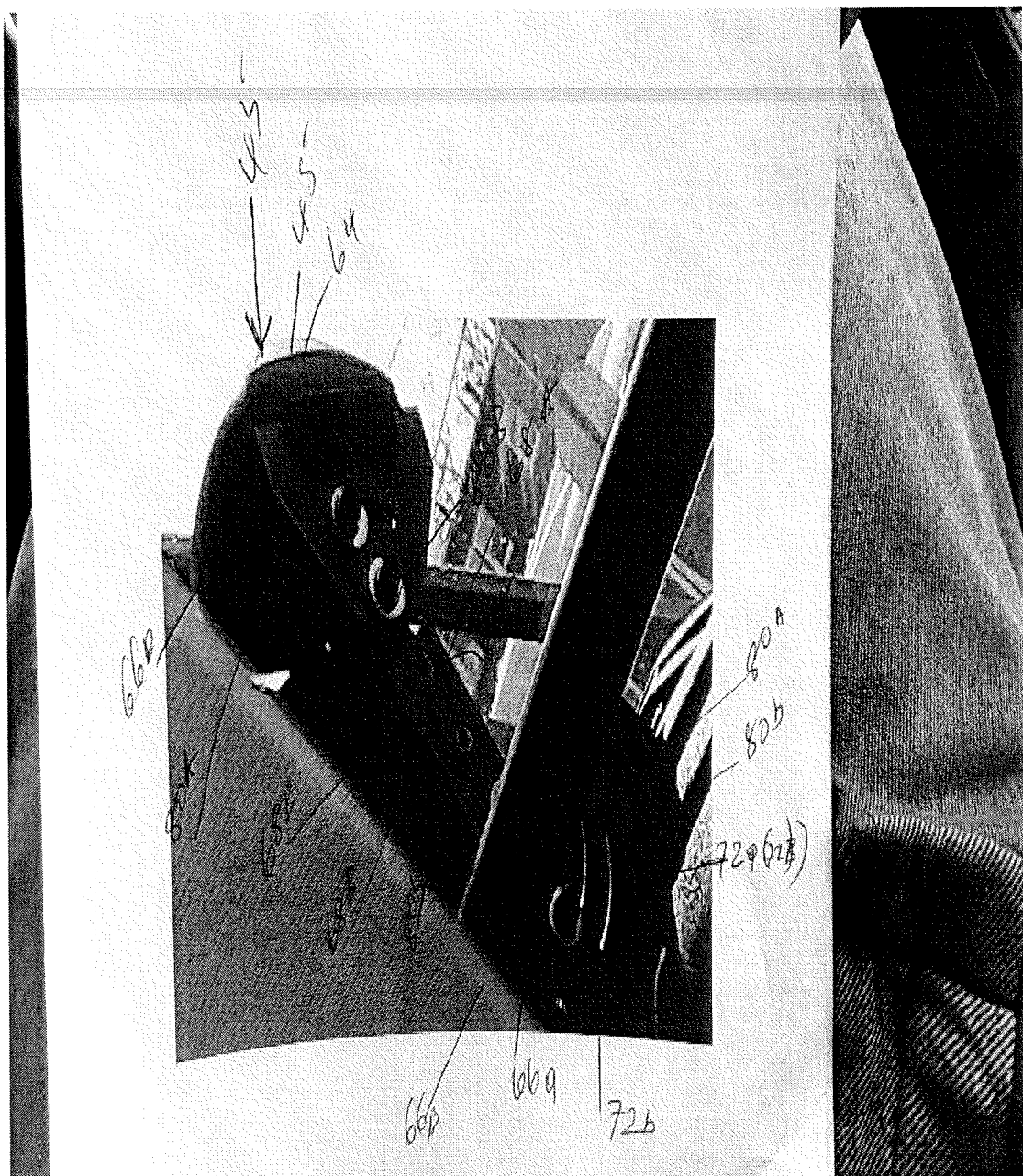
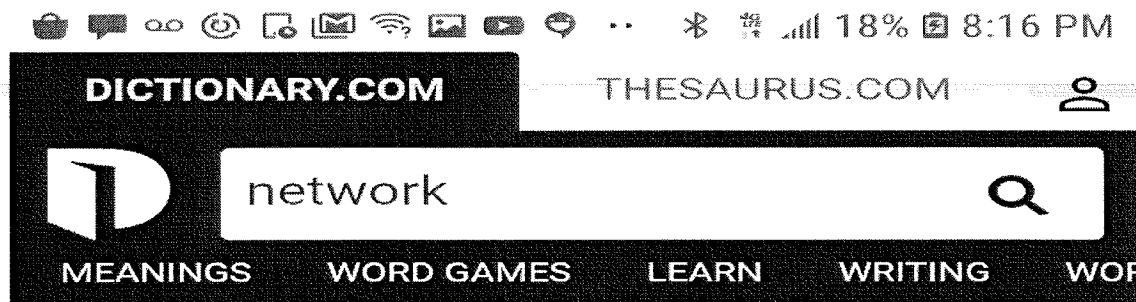


Fig. 4

7





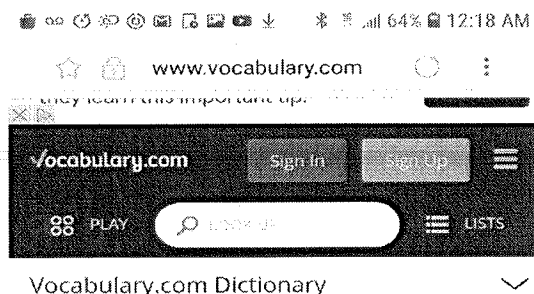
2 *Radio and Television.*

- a a group of transmitting stations linked by wire or microwave relay so that the same program can be broadcast or telecast by all.
- b a company or organization that provides programs to be broadcast over these stations:

She was hired by the network as program coordinator.

- 3 *Telecommunications, Computers.* a system containing any combination of computers, computer terminals, printers, audio or visual devices, or telephones interconnected by

**The Only
Gift
Parents
Need Is
Here**

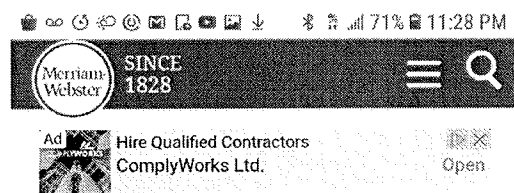


adjustable

Something that's adjustable can be changed or altered so that it works or fits better. A car's *adjustable* seat can accommodate both very tall and very short drivers.

✓ Start learning this word

Back Forward Home Bookmarks Tabs



Thesaurus

adjustable

adjective

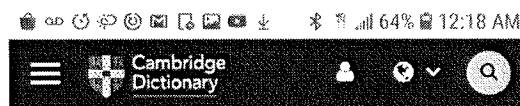
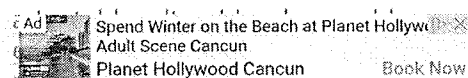
Save Word

Synonyms & Antonyms of *adjustable*

capable of being readily changed

// quantities that are easily *adjustable*
if you're cooking for a larger crowd

Synonyms for *adjustable*



adjustable

adjective

US /ə'dʒʌs.ta.bəl/ UK /ə'dʒʌs.ta.bəl/

able to be changed to suit particular needs:

- The height of the steering wheel is *adjustable*.
- Is the strap on this helmet *adjustable*?

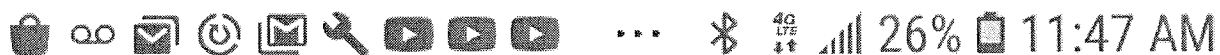
— SMART Vocabulary: related words and phrases

Adapting and modifying

acclimate

acclimatization





Learner's Dictionary



adaptable



adaptable 

/ə'dæptəbəl/

adjective

Save



[more adaptable; most adaptable]

: able to change or be changed in order to fit or work better in some situation or for some purpose : able to adapt or be adapted

- an *adaptable* tool that combines a screwdriver, a corkscrew, and pliers
- very *adaptable* animals

[\[-\] Hide examples](#)

— often + to

- These plants are all easily *adaptable to* colder climates.
- The computer program is *adaptable to* the needs of individual users.